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March 23, 2021

VIA E-MAIL

Adam M. Slater, Esq.  
Mazie Slater Katz & Freeman, LLC  
aslater@mazieslater.com

**Re: *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation,*  
U.S. District Court for the District of New Jersey; Case No. 1:19-md-02875-  
RBK-KMW**

Dear Counsel:

In advance of the meet and confer between the parties pursuant to the Court's Order dated March 16, 2021 (ECF Doc. 1034), we write to inform you that the Chinese State Secret Log served by Zhejiang Huahai Pharmaceutical Co. ("ZHP") contained a number of duplicate entries, as set forth below. When controlling for those duplicates, the number of documents being withheld or redacted on the basis of Chinese state secrets is 37. In addition, ZHP will be producing Document 2 (PRINBURY00142721), Document 6 (PRINBURY00144511), and Document 38 (ZHP02613429), which are duplicates of one another, and which were inadvertently included on the Log. As a result, the parties need only discuss 34 withheld documents and 2 redacted documents during their meet and confer.

**Duplicative Documents on ZHP Parties State Secret Withholding Log**

DOCUMENT	DUPLICATE DOCUMENT(S)
Document 3 (PRINBURY00142827)	Document 4 (PRINBURY00142830); Document 5 (PRINBURY00144241); Document 22 (ZHP02606474); Document 23 (ZHP02606475); Document 24 (ZHP02606612); Document 25 (ZHP02606613);

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DOCUMENT	DUPLICATE DOCUMENT(S)
	Document 26 (ZHP02606614); Document 27 (ZHP02606615); Document 40 (ZHP02613611); Document 45 (ZHP02613651); Document 46 (ZHP02613656); Document 47 (ZHP02613659); Document 48 (ZHP02614160); Document 49 (ZHP02614172); Document 50 (ZHP02614174); Document 51 (ZHP02614402); Document 54 (ZHP02614593); Document 55 (ZHP02614891); Document 84 (PRINSTON00281865)
Document 7 (SYNCORES00037103)	Document 76 (ZHP02631527) Document 77 (ZHP02631528)
Document 10 (ZHP02557672)	Document 11 (ZHP02565439)
Document 12 (ZHP02604526)	Document 14 (ZHP02605151) Document 18 (ZHP02605370) Document 74 (ZHP02622088)
Document 16 (ZHP02605169)	Document 17 (ZHP02605172) Document 86 (ZHP02649414)
Document 29 (ZHP02608269)	Document 30 (ZHP02608270) Document 31 (ZHP02608273) Document 32 (ZHP02608277) Document 57 (ZHP02615297) Document 58 (ZHP02615298) Document 59 (ZHP02615303) Document 60 (ZHP02615306)
Document 34 (ZHP02611955)	Document 35 (ZHP02611956) Document 75 (ZHP02627585)
Document 19 (ZHP02605548)	Document 36 (ZHP02611974)
Document 39 (ZHP02613610)	Document 41 (ZHP02613630) Document 42 (ZHP02613631)

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DOCUMENT	DUPLICATE DOCUMENT(S)
	Document 43 (ZHP02613632) Document 44 (ZHP02613633) Document 52 (ZHP02614403) Document 53 (ZHP02614592)
Documents 65 (ZHP02622054)	Document 66 (ZHP02622055)
Document 68 (ZHP02622057)	Document 78 (ZHP02636528) Document 80 (ZHP02636532)
Document 85 (ZHP02649226)	Document 9 (ZHP02459190)
Document 87 (ZHP02649416)	Document 13 (ZHP02605097)

**Duplicate Documents on ZHP Parties State Secret Redaction Log**

DOCUMENT	DUPLICATE DOCUMENT(S)
Document 1 (ZHP02441394)	Document 2 (ZHP02441402)

We look forward to meeting with you on Friday.

Sincerely,

*/s/ Seth A. Goldberg*

Seth A. Goldberg